

February 28, 2022

VIA EMAIL

Tim Fischer
Superfund and Emergency Management Division
U.S. Environmental Protection Agency Region V
77 West Jackson Boulevard
Chicago, IL 60604

RE: Concurrence with Explanation of Significant Differences
South Andover Superfund Site: 2052 ½ Bunker Lake Road, Andover Minnesota 55303
CERLCA ID: MND98060914

Dear Tim Fischer:

This letter is in response to the proposed Explanation of Significant Differences (ESD) for the South Andover Superfund Site (Site) located at 2052 ½ Bunker Lake Road, Andover, Minnesota 55303. This letter also contains discussion of additional Minnesota Pollution Control Agency (MPCA) findings north of the Site.

ESD Concurrence

The MPCA has completed its review and concurs with the intent of the proposed ESD. The MPCA's concurrence is based on the current Site boundary as defined by the U.S. Environmental Protection Agency (EPA) and the MPCA's understanding that the defined Site boundary is entirely served by municipal water. We believe the statement of purpose should be revised; however, to reflect the current Andover City Code language.

The EPA's Statement of Purpose for the draft ESD is to "document a final decision to include institutional controls in the form of the Andover City Code requiring all properties to connect to municipal water *before a Certificate of Occupancy can be issued.*" The MPCA observes that there is no mention of a Certificate of Occupancy clause in the Andover City Code. Therefore, a revision to the Statement of Purpose is necessary.

Contamination Detected North of South Andover Site - Red Oaks Neighborhood

The MPCA discovered 1,4 dioxane and Per- and polyfluoroalkyl substances (PFAS) contamination in private drinking water wells on July, 2021 in the Red Oaks Neighborhood directly north of the EPA's South Andover Site. Recent sampling in the Red Oaks Neighborhood has yielded 50 private wells with results at or above the Minnesota Department of Health's health-based values for 1,4-dioxane and/or PFAS. Homes in this neighborhood are not connected to municipal water as municipal water is not available in this area at this time. Please find more information about the investigation at the following webpages:

1. <https://www.pca.state.mn.us/waste/protecting-andover-residents-contaminated-drinking-water>.
2. Groundwater data can be found at:
<https://webapp.pca.state.mn.us/cleanup/search/superfund?siteId=1458-AREA0000000004>.

According to the Interstate Technology and Regulatory Council's (ITRC) *History of Use of Potential Sources; 1,4-dioxane*, has been commonly used in solvents and inks. The ITRC document *History and Use PFAS* indicates that PFAS were also present in inks. Historical records for the South Andover Site document the storage and disposal of large quantities of waste solvents and inks. Disposal consisted of dumping into a pit or burning.

The EPA's 1988 Record of Decision (ROD) and 1992 ROD Amendment did not require sampling for PFAS or 1,4-dioxane because their existence in the environment was typically not known at those times. Additionally, the current monitoring program at the Site does not include 1,4-dioxane or PFAS; therefore, the MPCA cannot conclude that the Site does not contribute to the contamination in the Red Oaks Neighborhood.

These contaminants are highly miscible in groundwater and resistant to biodegradation. Therefore, when geologic conditions are favorable, they will readily migrate away from the original source area. Historical documentation from the South Andover Site indicates a northerly groundwater flow direction on the northern portion of the Site toward the impacted Red Oaks Neighborhood. For example, in maps contained within the *Final Remedial Investigation Report Volume 1 of 2 for South Andover* EPA WA 083-5L45.0, January 29, 1988 (pp. 113-115) the groundwater flow direction at the northern portion of the Site appears to be to the northwest or north-northwest. Furthermore, in a Pace Laboratories, Inc. Report dated April 6, 1981, titled *Andover Groundwater Monitoring*, page 21 states, "Groundwater under the southern part tends to flow south with water in the northern area tending to flow north". This is in reference to the Heidelberg property that is part of the Site.

The MPCA has initiated a study, intended to determine the possible source(s) of contamination to the Red Oaks Neighborhood and shared our findings, available to date, with the EPA on February 16, 2022. The study lists the Site as a potential source of the contamination to the Red Oaks Neighborhood.

Given the PFAS and 1,4-dioxane contamination that has recently (2021) been detected in the Red Oaks Neighborhood and its proximity to the Site, a thorough groundwater investigation is necessary to determine if the Site is a contributing source. Following an investigation into PFAS and 1,4-dioxane for the Site, an amendment to the remedy in the form of a ROD Amendment or ESD may be necessary.

We appreciate the EPA's willingness to incorporate this new information into the overall conceptual site model and look forward to discussing this further with you at your convenience. If you would like to discuss this information or have additional questions, please feel free to reach out to the Site Team of Eric Pederson at 651-757-2645 or eric.pederson@state.mn.us, David Oakes at 218-846-8127 or david.oakes@state.mn.us, and Matthias Wolf at 651-757-2859 or matthias.wolf@state.mn.us.

Sincerely,

Hans Neve

This document has been electronically signed.

Hans Neve
Manager
Closed Landfill & Technical Services Section
Remediation Division

HN/JH:mt